

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

**JOSE ESCALERA**

**PLAINTIFF**

vs.

No. 5:16-cv-1106-XR

**BASS FISHING & RENTALS, LLC,  
AND STEVEN JOHNSTON**

**DEFENDANTS**

**NOTICE OF SETTLEMENT**

The purpose of this Notice of Settlement is to apprise the Court that Plaintiff and Defendants have entered into a settlement and resolved all claims asserted by Plaintiff in this lawsuit. The parties are in the process of finalizing the settlement and have agreed to fund the settlement amount by July 20, 2017. The parties have further agreed that Plaintiff shall file a Motion to Dismiss with Prejudice no later than three (3) days following payment of the settlement amount. Therefore, the parties ask that they be given until July 25, 2017, to file their Motion to Dismiss.

Respectfully submitted,

**PLAINTIFF JOSE ESCALERA**

SANFORD LAW FIRM, PLLC  
One Financial Center  
650 S. Shackleford Road, Suite 411  
Little Rock, Arkansas 72211  
Telephone: (501) 221-0088  
Facsimile: (888) 787-2040

By: /s/ Josh Sanford  
Josh Sanford  
Tex. Bar No. 24077858  
josh@sanfordlawfirm.com

and

/s/ Justin H. Smith  
Paul E. Hash  
Tex. Bar No. 09198020  
Justin H. Smith  
Tex. Bar No. 24041943  
500 N. Akard, Suite 2500  
Dallas, Texas 75201  
Telephone: (214) 520-2400  
ATTORNEY FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I, Josh Sanford, do hereby certify that a true and correct copy of the foregoing NOTICE was electronically filed with the Clerk for the U.S. District Court, Western District of Texas, on June 1, 2017, using the electronic case filing system of the Court. The attorneys listed below are registered to receive an electronic copy hereof.

Paul E. Hash, Esq.  
hashp@jacksonlewis.com  
Justin H. Smith, Esq.  
Justin.smith@jacksonlewis.com  
JACKSON LEWIS P.C.  
500 N. Akard, Suite 2500  
Dallas, Texas 75201  
Tel: (214) 520-2400  
Fax: (214)-520-2008

/s/ Josh Sanford  
**Josh Sanford**